

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

KEISHA L. WILLIAMS,

Defendant.

Case No. 1:18-CR-160-LMB

Trial: October 15, 2018

GOVERNMENT'S EXHIBIT LIST

The United States of America, by and through undersigned counsel, hereby submits its list of trial exhibits.

GX	Description	Off'd	Adm'd
1-1	Zydacron Purchase Agreement		
1-2	Certified translation of final page of Zydacron Purchase Agreement		
1-3	U.S. Consul's certificate of authenticity of foreign public record		
2-1	Deissenberger letter dated October 9, 2017		
2-2	Ritchie letter dated July 13, 2016		
2-3	Ritchie letter dated March 2, 2017		
2-4	Ritchie letter dated April 18, 2017		
2-5	McLean letter dated May 15, 2015		
2-6	Ritchie letter dated October 10, 2017		

GX	Description	Off'd	Adm'd
2-7	Ritchie letter dated August 31, 2016		
3-1	Text message #s 160570–72 between Williams and D’Andrade		
3-2	Text message #s 160585–86 between Williams and D’Andrade		
3-3	Text message #s 56069–63747 between Williams and D’Andrade		
3-4	Text message #s 125644–127537 between Williams and D’Andrade		
3-5	Text message #s 78815–78817 between Williams and Arthur Robinson		
3-6	Text message #s 159574–159642 between Williams and D’Andrade		
3-7	Text message #s 158331–158340 between Williams and D’Andrade		
3-8	Text message #s 127898–129032 between Williams and D’Andrade		
3-9	Text message #s 00000423-00010721 between Williams and D’Andrade		
3-10	Text message #s 00038495-00038984 between Williams and D’Andrade		
3-11	Text message #s 00039489-00040862 between Williams and D’Andrade		
3-12	Text message #s 00042243-00042343 between Williams and D’Andrade		
3-13	Text message #s 00044735-00045058 between Williams and D’Andrade		

GX	Description	Off'd	Adm'd
3-14	Text message #s 00055054-00055132 between Williams and D'Andrade		
3-15	Text message #s 00078128-00083573 between Williams and D'Andrade		
3-16	Text message #s 00092886-00099640 between Williams and D'Andrade		
3-17	Text message #s 00101138-00101147 between Williams and D'Andrade		
3-18	Text message #s 00101599-00102153 between Williams and D'Andrade		
3-19	Text message #s 00103106-00106734 between Williams and D'Andrade		
3-20	Text message # 00107484 between Williams and D'Andrade		
3-21	Text message #s 00109098-00109104 between Williams and D'Andrade		
3-22	Text message #s 00111132-00132377 between Williams and D'Andrade		
3-23	Text message #s 00158300-00158317 between Williams and D'Andrade		
3-24	Text message #s 00162034-00165486 between Williams and D'Andrade		
3-25	Text message #s 00171077-00176702 between Williams and D'Andrade		
3-26	Text message #s 00179119-00179741 between Williams and D'Andrade		

GX	Description	Off'd	Adm'd
3-27	Text message #s 00181697-00187081 between Williams and D'Andrade		
3-28	Text message #s 7556, 7489-87 between Williams and Shirley Jo Sanders		
3-29	Text message # 7339 between Sanders and D'Andrade		
3-30	Text message #s 00146421 – 191728 between Williams and Daniel Osias		
3-31	SMS messages between Williams and Ike		
3-32	[Reserved]		
3-33	Text message #s 32933-32935 between Williams and Arthur Robinson		
3-34	Text message #s 17721-17784 between Williams and Arthur Robinson		
3-35	Text message #s 106839-106866 between Williams and Arthur Robinson		
3-36	Text message #s 176186-176219 between Williams and Ruben Gresham		
3-37	Text message #s 187701-187782 between Williams and Ruben Gresham		
3-38	Text message #s 188221-188321 between Williams and Ruben Gresham		
3-39	Text message # 188688 between Williams and Ruben Gresham		
3-40	Text message # 31391 – 61406 between Williams and Daou		

GX	Description	Off'd	Adm'd
3-41	Text message #s 159772–160888 between Williams and Newsome		
3-42	Text message #s 186628–631 between Williams and Freeman		
3-43	Text messages #s 163903–164267 between Williams and [REDACTED] 1117		
3-44	Text message # 169666 between Williams and D'Andrade		
3-45	Text messages between Williams and multiple others, August 14, 2017, through October 12, 2017		
3-45-1	Image000000(23).png		
3-45-2	Image000000(51).jpg		
3-45-3	IMG_20170903_1030431(3).jpg		
3-45-4	IMG_20170903_1026368.jpg		
3-46	Text messages between Williams and multiple others, June 16, 2016 through July 27, 2016		
3-46-1	Imagejpeg_0)(290)		
3-46-2	Imagejpeg_1(28)		
4-1	Email from D'Andrade to Amini Osias dated March 3, 2017		
4-2	Email from Williams to D'Andrade dated September 2, 2017 with 2-page attachment		
4-3	Email chain re: "Fw: Delta Computer solutions, Inc." with 2-page fax attachment		

GX	Description	Off'd	Adm'd
4-4	Email from Christian D'Andrade to Trevor D'Andrade dated July 13, 2016, with attached letter from Marlon Ritchie		
4-5	Email from Williams to Trevor D'Andrade dated July 15, 2016, with subject line "Documents"		
4-6	Email from Williams to Trevor D'Andrade dated July 15, 2016 containing multiple attachments		
4-7	Emails between Daniel Osias and Christian D'Andrade between November 15, 2016 and November 16, 2016		
4-8	Email from Christian D'Andrade to Keisha Ramrattan, dated October 22, 2017		
4-9	Email from Christian D'Andrade to Keisha Ramrattan, dated October 23, 2017		
4-10	Email from Williams to UCE dated October 12, 2017, with Deissenberger letter attached		
4-11	Email from Williams to UCE dated October 16, 2017		
4-12	Email from Williams to Williams, dated August 31, 2016, with Merrill Lynch statement attached		
4-13	Email from Williams to Ritchie dated August 31, 2016		
5-1	Sanders check dated August 11, 2015, for \$8,000 to KWAC		
5-2	CitiBank account statement for KWAC, August 1–August 31, 2015		
5-3	CitiBank internal screenshot		

GX	Description	Off'd	Adm'd
5-4	Five pages of internal Bank of America records relating to Williams' Merrill Lynch account		
5-5	Citibank official check 230201575		
5-6	Citibank March 2015 monthly statement for KWAC account		
5-7	Citibank official check 230245960		
5-8	Citibank April 2017 monthly statement for KWAC account		
5-9	Citibank official check 230255087		
5-10	Citibank October 2017 monthly statement for KWAC account		
5-11	Citibank branch addresses		
5-12	Bank of America Cashier's Check 0879802271		
5-13	Bank of America withdrawal slip for cashier's check 0879802271		
5-14	Bank of America credit copy for cashier's check 0879802271		
5-15	Bank of America account statement for February 2016 for account ending in 7442		
5-16	Bank of America teller records for transfer of \$180,000 into account ending in 7442 on February 8, 2016		
5-17	BB&T January 2018 monthly statement for Williams account		
5-18	Citibank December 2017 monthly statement for KWAC account		

GX	Description	Off'd	Adm'd
5-19	Redacted Merrill Edge Statement for \$58 million		
6-1	PRTT records for target number [REDACTED] 9990 for January 1, 2018		
6-2	PRTT records for target number [REDACTED] 4144 for January 1, 2018		
6-3	Verizon phone records for [REDACTED] 4144 for July 14, 2016		
6-4	AT&T phone records for [REDACTED] 9990 from July 14, 2016		
6-5	AT&T phone records for [REDACTED] 9990 from July 27, 2016		
6-6	AT&T phone records for [REDACTED] 9990 from December 9, 2016		
6-7	Cell site data for July 14, 2016		
6-8	Cell site data for July 15, 2016		
6-9	Cell site data for July 27, 2016		
6-10	Cell site data for October 16, 2017		
6-11	Cell site data for December 9, 2016		
6-12	Cell site data for November 1, 2017		
6-13	Cell site data for January 2, 2018		
6-14	PRTT records for target number [REDACTED] 9990 for November 1, 2017		

GX	Description	Off'd	Adm'd
7-1	Loan Agreement and Right of First Refusal between Williams and D'Andrade		
7-2	"Updated List of People I Borrowed Money From"		
7-3	Notice from PayPal to Daniel Osias of payments to KWAC on January 26, 2018		
7-4	Notice from PayPal to Daniel Osias of payments to KWAC on January 26, 2018		
7-5	Handwritten note with information regarding KWAC and \$100,000 loan		
7-6	Referrals to Celerity by Carla McPhun		
7-7	Four Seasons invoice		
8-1	UCE video recording of Williams on October 12, 2017		
8-2	Clips from UCE video recording of Williams on October 12, 2017		
8-3	Transcript of clips from UCE video recording of Williams on October 12, 2017		
9-1	Package left at Thomas Murphy's door		
9-2	Papers pertaining to a Wells Fargo fax		
9-3	Steve Ike Wells Fargo fax		
9-4	Jimmy Choo neon patent Geranium stilettos		
9-5	Barney's high-top lace-ups		

GX	Description	Off'd	Adm'd
9-6	IRO tank top		
9-7	Veronica Beard jacket		
9-8	Breitling watch		
10-1	Jamaal King CV		
10-2	[reserved]		
10-3	Richard Fennern CV		
10-4	Richard Fennern final report		
10-5	Conroy Jett CV		
10-6	Conroy Jett – 1 CD UFED Reader; 1 Blu Ray UFED Filesystem & Logical Extractions [Demonstratives]		
10-7	Cell tower map for July 14, 2016		
10-8	Cell tower map for July 15, 2016		
10-9	Cell tower map for July 27, 2016		
10-10	Cell tower map for October 16, 2017		
10-11	Cell tower map for December 9, 2016		
10-12	Cell tower map for November 1, 2017		

GX	Description	Off'd	Adm'd
10-13	Cell tower map for January 1, 2018 (EDT)		
10-14	Photograph of a cell tower		
10-15	Diagram of orientation points for cell tower		
10-16	Diagram of three sectors of cell tower		
11-1	Inflows to bank accounts in the name of Keisha Williams and/or KWAC		
11-2	Sources of Money Raised for Software		
11-3	Text messages from Keisha Williams to Christian D'Andrade referencing money that Williams got from people		
11-4	Outflows from bank accounts in the name of Keisha Williams and/or KWAC		
11-5	Travel		
11-6	Payments made from accounts in the name of Keisha Williams and/or KWAC to Austria		
12-1	Christian D'Andrade Plea Agreement		
12-2	Christian D'Andrade Statement of Facts		
12-3	Carla McPhun Plea Agreement		
12-4	Carla McPhun Statement of Facts		

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

G. Zachary Terwilliger
United States Attorney

By: /s/
Grace L. Hill
Counsel for the United States